

JUDGE CHIN

original

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -x

UNITED STATES OF AMERICA :

v. :

HAKEEM OGUNNOWO and :
JIMI SODA, :

: 05 Cr.

Defendants. :

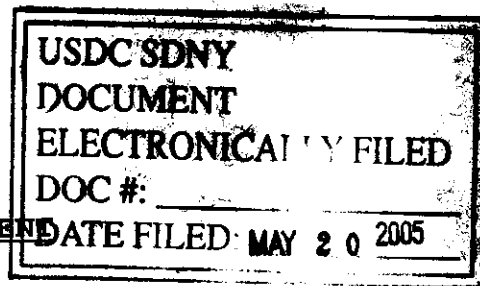
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COUNT ONE

The Grand Jury charges:

1. From at least in or about April 2004, up to and including in or about June 2004, in the Southern District of New York and elsewhere, HAKEEM OGUNNOWO and JIMI SODA, the defendants, and others known and unknown, unlawfully, willfully and knowingly, did combine, conspire, confederate and agree together and with each other to violate Title 18, United States Code, Section 1344.

2. It was a part and an object of the conspiracy that HAKEEM OGUNNOWO and JIMI SODA, the defendants, and others known and unknown, unlawfully, willfully and knowingly, did execute, and attempt to execute, a scheme and artifice to defraud and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, by means of false and fraudulent pretenses, representations, and promises, to wit,



INDICTMENT

05CRIM.

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OGUNNOWO and SODA each provided stolen, altered, and counterfeit checks to an individual not named herein, with the understanding that those checks would be deposited in a financial institution and that each of OGUNNOWO and SODA would subsequently receive a portion of the proceeds therefrom, in violation of Title 18, United States Code, Section 1344.

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

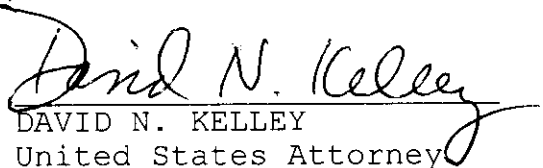
a. On or about April 13, 2004, HAKEEM OGUNNOWO and JIMI SODA, the defendants, gave counterfeit and/or stolen checks to an individual not named herein.

b. On or about April 22, 2004 and on or about May 3, 2004, SODA received the proceeds of a counterfeit or stolen check.

(Title 18, United States Code, Section 371.)



JOHN C. TOLAN
FOREPERSON



DAVID N. KELLEY
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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**HAKEEM OGUNNOWO and
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INDICTMENT

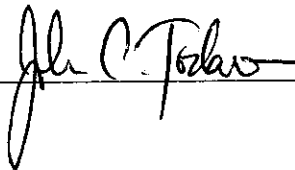
05 Cr.

(Title 18, United States Code,
Section 371.)

DAVID N. KELLEY

United States Attorney.

A TRUE BILL



Foreperson.

*3/20/05 re. Indictment filed; case assigned to judge. Chin
Gorenstein
U.S.M.J.*